

**Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council,  
Suffolk Coastal District Council and Suffolk County Council**

**Statement of Common Ground in relation to Strategic Cross Boundary Planning  
Matters in the Ipswich Strategic Planning Area**

**Version 4 – March 2019**

This Statement of Common Ground is published by Babergh and Mid Suffolk District Councils, Ipswich Borough Council and Suffolk Coastal District Council to accompany the Submission of the Suffolk Coastal Local Plan (under Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

Further versions will be published alongside the future key stages of the production of the Babergh and Mid Suffolk Joint Local Plan and the Ipswich Local Plan.

This follows the guidance contained in the Planning Practice Guidance (PPG) which states that Statements of Common Ground should be made available throughout the plan making process. This Statement of Common Ground has been drafted following the guidance contained in the PPG. Earlier versions of the Statement of Common Ground (which are now superseded by this document) have been published as follows:

- Version 1: A Working Draft Statement of Common Ground was published as part of the consultation on the Suffolk Coastal First Draft Local Plan in July 2018.
- Version 2: A revised Working Draft Statement of Common Ground was published alongside the report to Ipswich Borough Council Executive in November 2018 (report reference E/18/32) and as part of the consultation on the Ipswich Local Plan Preferred Options (January – March 2019).
- Version 3: Statement of Common Ground (December 2018) published alongside the Suffolk Coastal Final Draft Local Plan (January 2019).

This Statement of Common Ground has been informed through meetings of the Ipswich Strategic Planning Area Board. It will be refined to add further clarity to the specific approach, priorities and projects listed herein, as appropriate and on an ongoing basis. It is anticipated that further revisions will be made to reflect the evolution of the Babergh and Mid Suffolk Joint Local Plan and the Ipswich Local Plan, and these will be published at the appropriate time. If necessary, further revisions will be made in relation to progression of the Suffolk Coastal Local Plan.

It is intended that the Statement of Common Ground will be signed prior to the Submission of each Local Plan for Examination, under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended.

**1. Area covered by the Statement of Common Ground**

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council as shown on the map overleaf.

The Planning Practice Guidance states that a Statement of Common Ground will need to cover the area that policy making authorities and public bodies cooperate within, depending on the strategic matters being planned for and the most appropriate functional geography for the gathering of evidence and the preparation of planning policies. However, local planning authorities may have more than one Statement of Common Ground where there are strategic cross-boundary matters to be addressed.

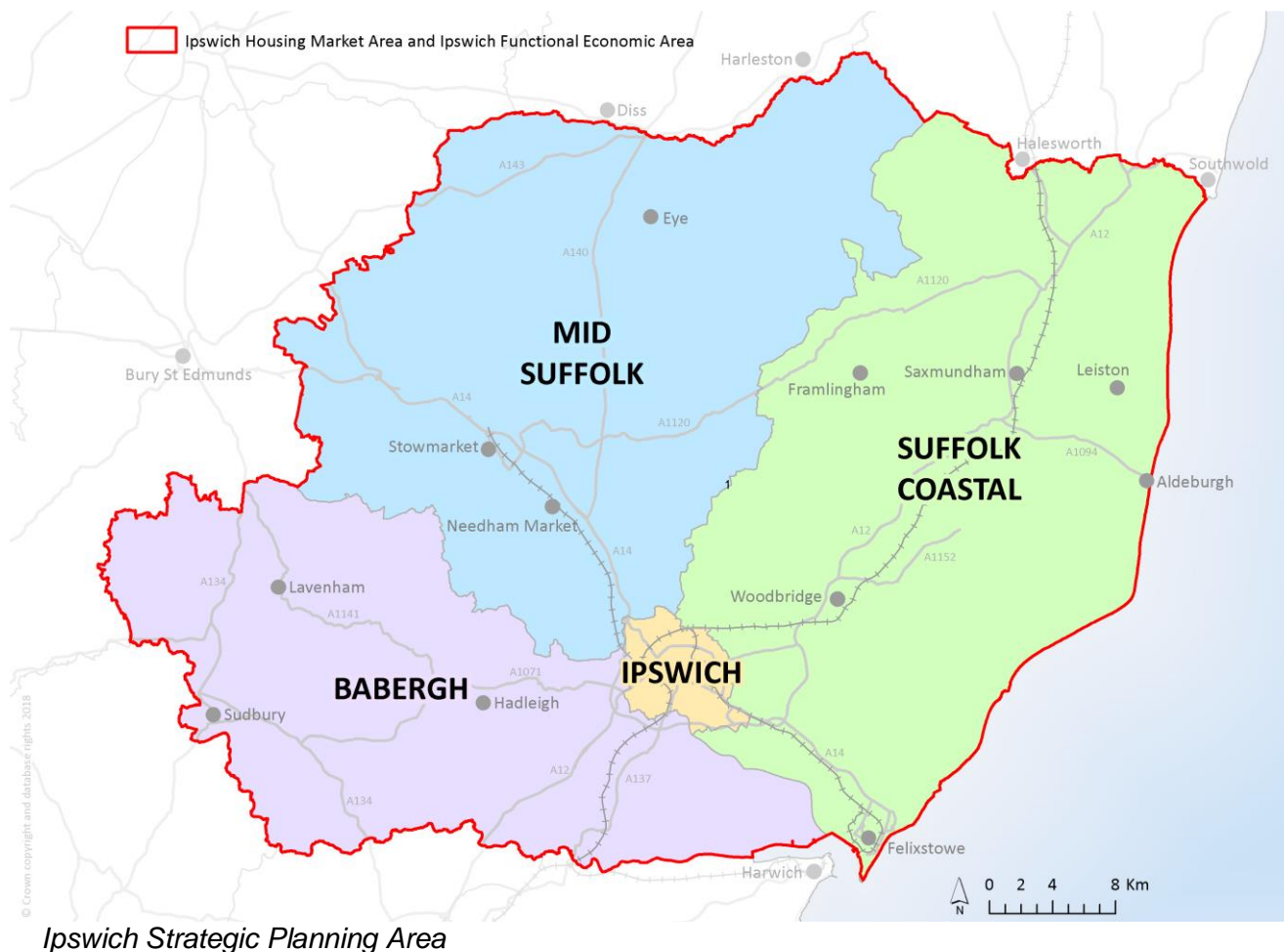
The area covered is the area identified as the Ipswich Housing Market Area and Ipswich Functional Economic Area through the production of the Strategic Housing Market Assessment and the Employment Land Needs Assessment respectively. For the purposes of joint working on planning policy, this area is defined as the Ipswich Strategic Planning Area. Recognising the functional relationship between the four authorities, the authorities have over a number of years worked together on the production of evidence to support local plans.

The authorities have discussed at the Ipswich Strategic Planning Area Board and subsequently agreed that this geography is appropriate in relation to the strategic planning matters covered by this Statement of Common Ground.

## **2. Authorities covered by the Statement of Common Ground**

The signatories to this Statement of Common Ground are:

- Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council.
- Suffolk County Council is signatory in relation to matters which relate to County Council responsibilities, including as mineral and waste planning authority.
- Natural England is signatory in relation to Section J Mitigation of Potential Impacts upon Internationally Protected Sites.



### 3. Purpose of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters.

The National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance require local planning authorities to produce a Statement of Common Ground as a written record of progress made on the planning for strategic matters across local authority boundaries.

This Statement of Common Ground will support the production of Local Plans in the Ipswich Strategic Planning Area by:

- Setting out those matters which are strategic cross-boundary matters in relation to the production of Local Plans as defined by the NPPF (Section 3);
- Outlining agreements and outcomes in relation to those strategic matters;
- Reflecting statutory and policy requirements re the Duty to Co-operate.

The Statement of Common Ground focuses on strategic cross-boundary matters. Planning matters that do not raise strategic cross boundary issues are covered within Local Plans but are not detailed within this Statement.

#### **4. Governance arrangements**

The Ipswich Strategic Planning Area Board (ISPA Board) (formerly the Ipswich Policy Area Board) consists of Members from each of the four local planning authorities and Suffolk County Council. The Terms of Reference were revised in March 2018, including to recognise that an appropriate geography for the Board is the extent of the Ipswich Housing Market Area / Ipswich Functional Economic Area. The Board provides a mechanism for the five local authorities to work together on the production of evidence and the coordination of housing and employment growth requirements and infrastructure delivery where this relates to strategic cross-boundary matters. This can be reported back to each District and Borough Council who will themselves take formal decisions regarding the content of their own Local Plans, through the relevant procedures at each stage of local plan production.

The ISPA Board Terms of Reference and Action Notes from the meetings can be viewed at [www.ipswich.gov.uk/content/ipswich-strategic-planning-area](http://www.ipswich.gov.uk/content/ipswich-strategic-planning-area).

The Action Notes of the Board are shared with the Suffolk Growth Portfolio Holders.

#### **5. Strategic matters being addressed**

The sections below detail the strategic cross-boundary matters that are addressed by this statement.

The local planning authorities may produce other Statements of Common Ground with other bodies where necessary, and with other local authorities who share a common boundary and where there are strategic cross-boundary matters.

The key strategic cross-boundary matters being addressed by this statement are:

- A) Alignment of timetables;
- B) Strategic Policies and Vision for the ISPA;
- C) Agreeing the approach to the delivery of the housing requirement;
- D) Impact of bordering strategic housing developments;
- E) Defining the functional economic market area and objectively assessed need;
- F) Impact of bordering strategic employment land developments;
- G) Enhancement and regeneration of retail centres;
- H) Strategic Infrastructure Priorities;
- I) Identification of cumulative / cross border infrastructure requirements resulting from planned growth, and mitigation measures;
- J) Mitigation of potential impacts upon internationally protected sites.

## Local Plan production

### A. Alignment of timetables

#### Background

The local planning authorities are producing plans as follows:

- Babergh and Mid Suffolk Joint Local Plan
- Ipswich Local Plan
- Suffolk Coastal Local Plan

As the local plans cover the extent of the Ipswich Strategic Planning Area, and share joint evidence in this respect, it is considered appropriate that the plans cover the same end date of 2036 and are produced to timescales which are aligned as far as is possible.

All authorities undertook Issues and Options consultations during summer / autumn 2017. As at March 2019, the current position in relation to the production of each local plan is as follows:

- Babergh and Mid Suffolk Joint Local Plan – work is underway on the production of a draft local plan, with consultation anticipated during summer 2019;
- Ipswich Local Plan – consultation on the Local Plan Review Preferred Options was carried out between 16<sup>th</sup> January and 13<sup>th</sup> March 2019. It is anticipated that a proposed submission plan will be published to receive representations under Regulation 19 of the 2012 Regulations between August and October 2019;
- Suffolk Coastal District Council – consultation on the First Draft Local Plan was undertaken between 20<sup>th</sup> July and 14<sup>th</sup> September 2018. The Final Draft Local Plan was published to receive representations under Regulation 19 of the 2012 Regulations between 14<sup>th</sup> January and 25<sup>th</sup> February 2019. The Local Plan is to be submitted to the Planning Inspectorate in March 2019 for Examination.

Where relevant, the outcomes and arrangements set out in the Statement of Common Ground are reflective of the current stages of plan-making.

#### Evidence

Broad alignment of timescales is set out in the authorities' Local Development Schemes:

- Babergh and Mid Suffolk Local Development Scheme (July 2018)
- Ipswich Local Development Scheme (March 2019)
- Suffolk Coastal Local Development Scheme (October 2015)

Where Local Development Schemes need to be amended, as far as possible the timescales for preparation of local plans will seek to be broadly aligned.

In relation to the time period to be covered by the local plans, the proposed standard methodology for calculating housing need sets a consistent base date and method for calculating housing need in local plans. The Planning Practice Guidance states that the

current year should be the first year<sup>1</sup> (for the purposes of calculating housing need) and therefore the base date of the local plans will be 2018. The Strategic Housing Market Assessment (2017) and Employment Land Needs Assessment (2016) adopt an end date of 2036.

#### Process of reaching outcomes and agreements

As per evidence above. The position is agreed through the ISPA Board and through the adoption of Local Development Schemes.

#### Outcomes and agreements

A1) It is agreed that the Local Plans will adopt an end date of 2036, and will adopt a base date consistent with the standard method for calculating local housing need.

#### Arrangements for necessary ongoing co-operation

Authorities to work closely through the ISPA Board and associated officer meetings to continue to align as far as possible.

### **B. Strategic Policies and Vision for the ISPA**

#### Background

Babergh and Mid Suffolk Districts are producing a Joint Local Plan, reflecting their Council-wide arrangements for joint working. Ipswich Borough Council and Suffolk Coastal District Council are each producing a local plan. Reflecting the agreements under the Duty to Co-operate as detailed in this statement, the authorities recognise the benefits and clarity afforded through developing strategic policies that respond to the strategic planning matters relevant to the ISPA. The ISPA Board is also working towards a broader vision for the area.

#### Evidence

Evidence referred to in the sections below.

#### Process of reaching outcomes and agreements

The ISPA Board considered the options for incorporating either shared or complementary policies in the respective local plans at its meetings on 26.3.2018, 23.4.2018 and 30.5.2018.

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<sup>1</sup> PPG Reference ID 2a-004-20180913

## Outcomes and agreements

### B1)

#### Vision

A vision for the ISPA has been considered through the ISPA Board and the following are agreed as the principles of the vision:

Across the Ipswich Strategic Planning Area, we are being ambitious about delivering economic growth, improving infrastructure and boosting the supply and mix of homes.

Within the Ipswich Strategic Planning Area collectively the authorities will seek to achieve, through the Local Plans, the following aspirations:

- A strong economy focussed around Ipswich as county town, the energy sector and energy coast, opportunities arising from the University of Suffolk and the international significance of the Port of Felixstowe;
- Enhanced connectivity with the rest of the east of England and the UK via the A14/A12/A140 and rail connections, and a commitment to sustainable, integrated travel;
- Healthy communities supported by the provision of a mix of housing;
- Distinctive urban and rural environments that contribute towards high quality of life.

B2) The four local planning authorities' local plans will have regard to the outcomes in this Statement of Common Ground, including in relation to an agreed broader vision for the Ipswich Strategic Planning Area. The emerging Local Plans incorporate policies which consider strategic matters related to housing and employment growth, infrastructure provision and mitigation of impacts on European protected sites<sup>2</sup>.

B3) The National Planning Policy Framework (NPPF) requires plans to make explicit which policies are strategic policies. These may contain strategic cross-boundary matters or other strategic matters relevant to a local authority area. In relation to strategic cross-boundary matters, the authorities have each had regard to these within their emerging respective plans in order to demonstrate how the plans will contribute to the vision for the ISPA.

## Arrangements for necessary ongoing co-operation

The ISPA Board and officers will continue to discuss strategic cross-boundary matters with a view to agreeing approaches to addressing these matters, and to reflect the approaches within local plan policies where appropriate.

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<sup>2</sup> Through decision making within local authorities as set out in Section 4 of this Statement

## **Housing**

### **C. Agreeing the approach to delivery of the housing requirement**

#### Background

The SHMA Part 1 identified the objectively assessed housing need (OAN) for the four local planning authorities. Subsequently, the Government proposed a national standard method for the calculation of housing need through the 'Planning for the Right Homes in the Right Places' consultation (September 2017). The Government has carried these proposals forward through the revisions to the NPPF and the Planning Practice Guidance.

Paragraph 60 of the NPPF (February 2019) states that the standard methodology should be used as the basis for identifying the local housing need, unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals.

Paragraph 60 of the NPPF states that in establishing the amount of housing to be planned for, planning authorities should take into account any needs that cannot be met in neighbouring areas.

#### Evidence

The two key pieces of evidence relevant are the housing need and the housing supply.

The housing need as calculated under the national standard method is set out in the table below, alongside the objectively assessed housing need identified through the 2017 Strategic Housing Market Assessment:



	SHMA annual	SHMA total (2014-2036)	Standard method annual (Sept 2017)	Standard method total (2016 – 2036)	Standard method annual (2016-based)	Standard method total (2016-based) (2018-2036)	Standard method annual (2014-based)	Standard method total (2014-based) (2018-2036)
<b>Babergh</b>	355	7,820	439	8,780	420	7,560	420	7,560
<b>Ipswich</b>	519	11,420	442	8,840	479	8,622	445	8,010
<b>Mid Suffolk</b>	452	9,951	573	11,460	590	10,620	585	10,530
<b>Suffolk Coastal</b>	460	10,111	495	9,900	582	10,476	515	9,270
<b>Total</b>	1,786	39,302	1,949	38,980	2,071	37,278	1,965	35,370

Table 1: Housing Need

Local housing need as calculated through the standard methodology represents the starting point in identifying a housing requirement. Government consultation initially took place in relation to the standard methodology in September 2017, whereby figures were published which were based upon the 2014-based household projections. The 2016-based household projections were published in September 2018 and the calculation of housing need was updated accordingly<sup>3</sup>. Following Government consultation in October 2018, changes to the Planning Practice Guidance in February 2019 were made stating that local authorities should use the 2014-based household projections in calculating local housing need.

Local planning authorities are required to produce Strategic Housing and Employment Land Availability Assessments to identify the amount of land suitable, available and achievable for housing and employment development. The four authorities are producing evidence, the latest of which are as follows:

- Babergh and Mid Suffolk Draft Strategic Housing and Employment Land Availability Assessment was published in August 2017.
- Ipswich Borough Council Strategic Housing and Employment Land Availability Assessment (Draft published alongside consultation on Local Plan Preferred Options in January 2019).
- Suffolk Coastal District Council Strategic Housing and Employment Land Availability Assessment (Draft published July 2018. Final SHELAA published alongside Final Draft Local Plan in January 2019).

<sup>3</sup> A cap is applied to the Babergh figure in accordance with the Planning Practice Guidance

The authorities have worked together on closely aligning the criteria used for assessing the sites, although differences do occur where justified by local circumstances, for example, the approach to development in Flood Zones 2 and 3a.

#### Process of reaching outcomes and agreements

The Ipswich Strategic Planning Area Board provides a mechanism to discuss the authorities' approach to housing requirements and to inform and guide the approach to be taken within each Local Plan.

#### Outcomes and agreements

C1) The housing need calculated under the standard methodology will form the starting point for identifying housing requirements. The Suffolk Coastal First Draft Local Plan, published for consultation between July and September 2018, was based upon the need figures published by MHCLG in September 2017 under the 'Planning for the Right Homes in the Right Places' consultation. The NPPF was published in July 2018 and the Planning Practice Guidance updated in September 2018. The 2017 ratios of median workplace earnings to median house prices were published in April 2018 and the 2016-based household projections were published in September 2018. The Planning Practice Guidance has subsequently been updated in February 2019 to state that the 2014-based household projections should be used in the calculation. Local housing need as calculated under the standard method will form the starting point in identifying housing requirements.

C2) The standard method will, therefore, also provide the starting point for identifying the total amount of housing to be provided in the Ipswich Housing Market Area.

C3) Throughout the Local Plan preparation process, each local planning authority will undertake and maintain a thorough assessment of housing supply potential within their area. Each local planning authority will plan to meet its own housing need and should have a policy setting out the specific minimum housing number it is intending to deliver in its own area. Where the need cannot be met within the local authority's boundary, following a comprehensive re-assessment of deliverability the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

C4) Provision for Gypsies and Travellers – the 2017 Gypsy, Traveller, Travelling Showpeople and Boat Dwellers Accommodation Needs Assessment identified a need for additional pitches to be provided for Babergh, Mid Suffolk, Ipswich and Suffolk Coastal. Each local planning authority will plan to meet its own need for permanent pitches for Gypsies and Travellers and should have a policy setting out how this will be delivered in its own area. Where the capacity to accommodate pitches cannot be met within the local authority's boundary a comprehensive re-assessment of deliverability will be undertaken and the ISPA Board will provide the forum to collectively consider how the unmet need can be met within the ISPA, subsequently to be determined through each local authority's local plan.

C5) Mix and type of housing:

The Authorities published an update to Part 2 of the Strategic Housing Market Assessment in January 2019. This updates the size, type and tenure of housing needed, including the need for affordable housing, based upon the housing need calculated under the standard method.

C6) Strategic policies in emerging Local Plans are to reflect the outcomes above.

Arrangements for necessary ongoing co-operation

Land Supply:

Throughout the plan-making process, where comprehensive deliverability assessments demonstrate that the housing need cannot be met within the local authority's boundary the ISPA Board will provide the forum to collectively consider how the unmet need can be met.

Housing delivery:

As per paragraph 75 of the 2019 NPPF, Housing Action Plans will provide a mechanism for identifying actions to increase delivery where delivery falls below 95% of an authority's housing requirement (calculated over the previous three years). Each individual local authority may produce Housing Actions Plans if required to do so by Government. The ISPA Board can then consider any common or cross-boundary themes between two or more authorities.

**D. Consideration of bordering strategic housing developments**

Background

Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.

Evidence

The Councils have jointly commissioned transport modelling (with Suffolk County Council). The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan. Further transport modelling of preferred options has been undertaken and the Results Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019.

The Councils jointly commissioned a Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich.

The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.

### Process of reaching outcomes and agreements

The conclusions of the above evidence have been, and will continue to be, considered in site selection and in identifying any necessary mitigation.

### Outcomes and agreements

Land north east of Humber Doucy Lane is identified as a cross-border location for future development (within Ipswich Borough and Suffolk Coastal District) for housing delivery post 2031. This joint approach will help enable land within Ipswich Borough to come forward for housing.

The relevant policies in Local Plans are:

- Ipswich Core Strategy and Policies DPD Review Preferred Options (November 2018), Policy ISPA4 'Cross Boundary Working to Deliver Sites'
- Suffolk Coastal Final Draft Local Plan (January 2019), Policy SCLP12.24 'Land at Humber Doucy Lane, Rushmere St Andrew'

### Arrangements for necessary ongoing co-operation

Further transport modelling will take place where necessary to inform the Babergh and Mid Suffolk and Ipswich Regulation 19 plans.

## **Employment**

### **E. Defining needs for employment land**

#### Background

The Employment Land Needs Assessment (2016) defines the Ipswich Functional Economic Area as the area covered by the four local planning authority areas of Ipswich Borough and Babergh, Mid Suffolk and Suffolk Coastal Districts.

The Employment Land Needs Assessment also concludes the amount of employment land needed, based upon the modelling undertaken through the East of England Forecasting Model.

#### Evidence

Local Planning Authorities are required to identify the future needs for employment land. The four local planning authorities jointly commissioned an Employment Land Needs Assessment and an Ipswich Economic Area Sector Needs Assessment.

Local planning authorities are required to produce Strategic Housing and Employment Land Availability Assessments to identify the amount of land suitable, available and achievable for housing and employment development. The four local authorities are producing evidence, the latest of which are as follows:

- Babergh and Mid Suffolk Draft Strategic Housing and Employment Land Availability Assessment was published in August 2017.
- Ipswich Borough Council Strategic Housing and Employment Land Availability Assessment (Draft published alongside consultation on Local Plan Preferred Options in January 2019).
- Suffolk Coastal District Council Strategic Housing and Employment Land Availability Assessment (Final SHELAA published alongside Final Draft Local Plan in January 2019).

#### Process of reaching outcomes and agreements

The ISPA Board provides a mechanism to inform how each local authority will approach key employment sectors and each emerging Local Plan will have regard to these matters.

The ISPA Board provides a mechanism to inform the approach in each plan to meeting the quantitative and qualitative needs across the ISPA identified in evidence and each emerging Local Plan will have regard to these matters.

#### Outcomes and agreements

E1) Baseline jobs growth is identified in the Ipswich Economic Area Sector Needs Assessment, and for the period 2018 – 2036<sup>4</sup> equates to:

- Babergh: 2,970
- Ipswich: 15,580
- Mid Suffolk: 5,270
- Suffolk Coastal: 6,500

The baseline minimum employment land (for B class uses) to be provided in the Ipswich Functional Economic Area is 50 hectares over the period 2018 – 2036<sup>5</sup>, split as follows for each local authority:

- Babergh: 2.3ha
- Ipswich: 23.2ha
- Mid Suffolk: 7.7ha
- Suffolk Coastal: 11.7ha

Each local authority shall determine an appropriate approach to employment land provision, and may allocate more land if necessary to provide for flexibility and a range of sites.

A Port Logistics Study has been completed for Felixstowe and is reflected in planning for employment land in the Suffolk Coastal Local Plan.

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<sup>4</sup> Note this updates Table 3.1 on page 32 of the Ipswich Economic Area Sector Needs Assessment (September 2017), as the evidence used a 2014 base date.

<sup>5</sup> Note this updates Table 16.2 on page 202 of the Ipswich Economic Area Sector Needs Assessment (September 2017), as the evidence used a 2014 base date.

E2) The distinct economic geographies across the Functional Economic Area are:

- Felixstowe / A14 corridor;
- Wider Ipswich Market Area;
- A140 corridor;
- Rural and agricultural.

All local plans in the Functional Economic Area will seek to support and strengthen these.

E3) Strategic policies in local plans are to reflect the employment requirements identified in the evidence base. In terms of the A14, it is agreed that the specific needs for off port land requirements identified through the Port of Felixstowe Growth and Development Needs Study (2018) will be met within Suffolk Coastal District, reflecting the conclusions within that report. Other strategic scale employment sites in the A14 corridor include the Sroughton Enterprise Park (Former Sugar Beet Factory site, Babergh District) and Gateway 14 (Mill Lane, Stowmarket, Mid Suffolk District), and the development of these will support wider economic growth on the A14 corridor.

#### Arrangements for necessary ongoing co-operation

The ISPA Board provides a mechanism to help inform the authorities' approach to employment land requirements within each Local Plan, and each emerging Local Plan will have regard to these matters.

## **F. Impact of bordering strategic employment land developments**

### Background

Due to the close functional relationship between Ipswich Borough and the surrounding Districts, there is potential for cross-boundary issues relating to infrastructure provision, transport and highways and landscape/townscape as well as site selection where sites adjoin or cross the Ipswich Borough boundary.

### Evidence

The Councils have jointly commissioned transport modelling to be undertaken (with Suffolk County Council). Scenarios were modelled to inform the preferred options consultations. The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan and the Results Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019.

The Councils have jointly commissioned Settlement Sensitivity Assessment in relation to identifying landscape sensitivity around Ipswich.

The Strategic Housing and Employment Land Availability Assessments identify sites which border or cross authority boundaries.

### Outcomes and agreements

See cross boundary infrastructure (Section I) for details in relation to highways.

### Arrangements for necessary ongoing co-operation

Further transport modelling will take place where necessary to inform the Babergh and Mid Suffolk and Ipswich Regulation 19 plans.

## **Retail, leisure and other commercial**

### **G. Enhancement and regeneration of retail centres**

#### Background

The National Planning Policy Framework requires local planning authorities to define a network and hierarchy of centres that is resilient to anticipated future economic changes. As the county town, Ipswich acts as a focus for much of the retail and commercial leisure across the four authorities, which is taken account of in the baseline for each of the retail studies identified below.

#### Evidence

- Babergh and Mid Suffolk Town Centres and Retail Study (September 2015)
- Ipswich Borough and Suffolk Coastal District Retail and Commercial Leisure Town Centre Study (October 2017)

#### Process of reaching outcomes and agreements

The ISPA Board provides a mechanism to inform the authorities' approach to retail within each Local Plan, where necessary.

#### Outcomes and agreements

G1) Local plans to recognise the regional role of Ipswich town centre, alongside other towns and centres in the Functional Economic Area, as a focus for retail and commercial leisure activity, in accordance with the NPPF.

G2) Policy SCLP4.8 in the Suffolk Coastal Final Draft Local Plan requires proposals for retail uses outside of town centres to demonstrate no significant adverse impact on Ipswich town centre.

#### Arrangements for necessary ongoing co-operation

Through the ISPA Board.

## **Infrastructure provision**

### **Provision and enhancement of strategic infrastructure improvements**

#### **H. Strategic Infrastructure priorities**

##### **1. Ipswich Northern Route**

###### Background

In addition to integrated transport solutions, including bus network improvements within the Town and increased capacity of the local rail offering, a northern route around Ipswich is expected to be needed to enable growth in the long term. This intervention is needed to improve connectivity between the A14 and A12, enabling the delivery of growth and improving journey times, in turn reducing pressure on the A14 and improving network resilience, especially near the Orwell Bridge and Copdock interchange.

The successful regeneration of parts of Ipswich Waterfront will require additional crossings of the River Orwell. Whilst the delivery of a single span main bridge, which would have provided additional highway capacity, cannot now proceed, the County Council will still underwrite a maximum of £10.8m for other partners to deliver crossings to serve the Waterfront and deliver on Ipswich Local Plan regeneration objectives.

###### Evidence

An Ipswich Northern Route Study was published in January 2017, which assessed three indicative broad routes for a potential Ipswich Northern Route.

###### Outcomes and agreements

H1) Evidence informing the current adopted plans did not identify the need for a northern route, although all ISPA local authorities support the merit of the future project.

H2) Any future northern route would need to be complementary to a range of transport measures such as improvements to sustainable transport, and this will be addressed through future local plan reviews.

H3) The authorities expect that evidence gathering for the next set of local plans will examine route options in more detail, including the extent to which the options might support potential future scenarios for housing and employment growth beyond what will be planned for in the current local plan reviews.

H4) Consideration of funding mechanisms to enable delivery will be integrated within this next stage of evidence gathering.

H5) This position is reflected within the Suffolk Coastal Final Draft Local Plan (January 2019) and the Ipswich Core Strategy and Policies Review Preferred Options (November 2018).



Arrangements for necessary ongoing co-operation

Through the ISPA Board and through future reviews of Local Plans.

**2. Other strategic infrastructure priorities**

Background

The National Planning Policy Framework recognises the provision of infrastructure as integral to planning for new development. Public bodies across Suffolk recognise the benefits of collectively identifying and supporting strategic infrastructure priorities in order that focus can be placed upon securing these.

Evidence

Through Infrastructure Delivery Plans and Suffolk Growth Programme Board

Process of reaching outcomes and agreements

Through ISPA Board and Suffolk Growth Programme Board

Outcomes and agreements

H6) Strategic policies in Local Plans will reflect and support delivery of infrastructure priorities as deemed necessary and appropriate to the respective local plans. The infrastructure priorities within the ISPA are identified as:

- a) Ipswich Northern Route;
- b) A12 improvements;
- c) A14 improvements;
- d) Sustainable transport measures in Ipswich;
- e) Improved cycle and walking routes;
- f) Increased capacity on railway lines for freight and passenger traffic;
- g) Appropriate education provision to meet needs resulting from growth;
- h) Appropriate health provision to meet needs resulting from growth;
- i) Appropriate police, community safety and cohesion provision to meet needs resulting from growth;
- j) Provision of green infrastructure and Suitable Alternative Natural Greenspace;

- k) Improvements to waste management, water supply, foul sewerage and sewage treatment capacity; and
- l) Provision of appropriate digital telecommunications to provide mobile, broadband and radio signal for residents and businesses.

H7) Other infrastructure requirements related to growth planned in local plans is to be identified within the relevant local plans and Infrastructure Delivery Plans. Where necessary, Infrastructure Delivery Plans are to be aligned. Note that the list above does not represent any priority order.

#### Arrangements for necessary ongoing co-operation

The Ipswich Strategic Planning Area Board to provide a mechanism for co-operation in relation to requirements for infrastructure arising from development planned in local plans, as plans progress and are implemented. Local authorities will have regard to informed discussion at the ISPA Board.

The ISPA Board Terms of Reference identify the link between the ISPA Board and the Suffolk Growth Portfolio Holders.

### **I. Identification of cumulative / cross border infrastructure requirements resulting from planned growth, and mitigation measures**

#### Background

The NPPF recognises the provision of infrastructure as integral to planning for new development. Due to the close functional relationship between Ipswich and the surrounding Districts there is potential for cross-border or shared infrastructure requirements resulting from planned growth in emerging local plans.

#### Evidence

Transport modelling. The Methodology Report and the Results Report Volume 1: Suffolk Coastal and Ipswich were published in August 2018 as part of the consultation on the Suffolk Coastal First Draft Local Plan and the Forecasting Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019.

Evidence provided by Suffolk County Council in relation to education and early years capacities and constraints, and requirements for libraries and waste infrastructure.

Evidence provided through engagement with the NHS and Clinical Commissioning Groups in relation to the need for health infrastructure.

Evidence provided through Water Cycle Studies and engagement with Anglian Water and Essex and Suffolk Water.

Process of reaching outcomes and agreements

Shared framework<sup>6</sup> developed, as part of the preparation of infrastructure delivery plans, between the local planning authorities and Suffolk County Council for identifying potential education constraints and requirements.

Shared framework (as above) developed, as part of the preparation of infrastructure delivery plans, between the local planning authorities and Suffolk County Council for identifying potential highways constraints and requirements.

Ongoing engagement between the local planning authorities and Suffolk County Council in the production of local plans.

Outcomes and agreements

I1) Infrastructure requirements related to growth planned in local plans are to be identified within the relevant local plans and Infrastructure Delivery Plans. Where necessary, Infrastructure Delivery Plans are to be aligned.

Specific cross-boundary issues, outcomes and agreements are reported in the Annex to the Statement of Common Ground.

Arrangements for necessary ongoing co-operation

The Ipswich Strategic Planning Area Board to provide a mechanism for co-operation in relation to requirements for infrastructure arising from development planning in local plans, as plans progress.

The ISPA Board Terms of Reference identify the link between the ISPA Board and the Suffolk Growth Portfolio Holders.

**Environmental protection**

**Conservation and enhancement of the natural and historic environment**

The Councils' individual Local Plans will contain policies relating to conserving and enhancing the natural and historic environment at the District level, including nationally designated sites. The specific cross-boundary matters identified below relates to mitigation of potential impacts upon internationally protected sites related to increased recreation pressure.

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<sup>6</sup> In the form of an agreed template of questions and criteria

## **J. Mitigation of potential impacts upon internationally protected sites**

### Background

The Habitats Directive<sup>7</sup> requires that plans and projects must not adversely affect the integrity of Special Protection Areas (SPAs) and Special Areas of Conservation (SACs) (other than in exceptional circumstances where there are imperative reasons of overriding public interest).

Previous assessments undertaken in relation to the Habitats Directive / Regulations have identified the potential for impacts upon SPAs and SACs in relation to recreational disturbance resulting from development, and require mitigation to be secured to minimise the potential for adverse effects on the sites. Green infrastructure and Suitable Alternative Natural Greenspaces are identified within the strategic infrastructure priorities in section H of this statement.

### Evidence

Assessment under the Habitats Regulations is undertaken during production of the local plans.

Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council and Suffolk Coastal District Council (along with Waveney District Council) are producing a Recreation Avoidance and Mitigation Strategy (RAMS) to provide a mechanism to secure mitigation.

### Process of reaching outcomes and agreements

Assessment is undertaken at relevant stages in the production of emerging local plans to identify whether the plans are likely to adversely affect the integrity of Special Protection Areas and Special Areas of Conservation.

Natural England is a 'prescribed body'<sup>8</sup> for the purposes of the Duty to Co-operate. Consultation will take place with Natural England on assessments produced under the Habitats Directive.

### Outcomes and agreements

J1) The Habitats Regulations Assessment for the Suffolk Coastal District Local Plan at Final Draft Plan stage (December 2019) considers that there is significant potential for RAMS to be expanded to relate to growth in the Local Plan.

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<sup>7</sup> Directive 92/43/EEC

<sup>8</sup> As defined in the Town and Country Planning (Local Planning) (England) Regulations 2012

Arrangements for necessary ongoing co-operation

Continuation of joint approach to mitigation through the production of the RAMS and production of Supplementary Planning Document.

Ongoing liaison with Natural England through the production of Local Plans and RAMS.

Natural England are signatory to Section J of the Statement of Common Ground:

Signatory:



Name: Catherine Whitehead

Position: Team Leader, Area 9, Norfolk & Suffolk Team, Natural England.

Date: 27/03/2019

## **6. Process for reviewing the Statement of Common Ground**

The Statement of Common Ground will be reviewed at key stages during the production of the local plans and will be updated / amended as necessary. It will be refined to add further clarity to the specific approach, priorities and projects listed herein, as appropriate and on an ongoing basis. The triggers for updating the Statement of Common Ground could include (but are not limited to):

- An authority or authorities reaching a key stage in the production of their plan(s);
- Changes to the housing number resulting from the publication of new household projections or affordability ratios;
- If a local authority resolves that it has unmet housing need within its area;
- Consultation feedback;
- The production of new assessments or evidence;
- Changes to national policy.

It is acknowledged that there may be instances where the ISPA authorities are unable to agree on outcomes. In such instances this will be documented within future versions of the Statement of Common Ground. This reflects guidance contained in the Planning Practice Guidance.

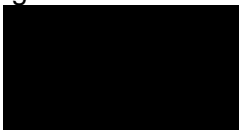
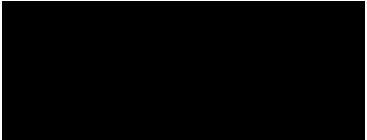


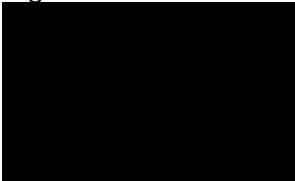
It is proposed that the Statement of Common Ground will be updated and published at various times when authorities reach milestones in the preparation of Local Plans and/or key pieces of evidence emerge. The Statement of Common Ground has been published at the stages outlined below:

- Version 1: A Working Draft Statement of Common Ground was published as part of the consultation on the Suffolk Coastal First Draft Local Plan in July 2018.
- Version 2: A revised Working Draft Statement of Common Ground was published alongside the report to Ipswich Borough Council Executive in November 2018 (report reference E/18/32) and as part of the consultation on the Ipswich Local Plan Preferred Options (January – March 2019).
- Version 3: Statement of Common Ground (December 2018) published alongside the Suffolk Coastal Final Draft Local Plan (January 2019).
- Version 4: Updating and signing of version 3 – submitted alongside the Suffolk Coastal Final Draft Local Plan.

## Signatories

The signatories to the Ipswich Strategic Planning Area Statement of Common Ground are set out below:

(Note: It is intended that the Statement of Common Ground will be signed prior to the Submission of each Local Plan for Examination under Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012, as amended).

Signed on behalf of Babergh District Council:  Tom Barker Assistant Director – Planning and Communities with delegated authority on behalf of Babergh District Council	Date:  22/3/19
Signed on behalf of Ipswich Borough Council:  Martyn Fulcher Head of Development with delegated authority from Executive	Date:  25/3/19
Signed on behalf of Mid Suffolk District Council:  Tom Barker Assistant Director – Planning and Communities with delegated authority on behalf of Mid Suffolk District Council	Date:  22/3/19
Signed on behalf of Suffolk Coastal District Council:  Councillor Tony Fryatt Cabinet Member for Planning	Date:  25/3/19
Signed on behalf of Suffolk County Council:  John Pitchford Head of Planning with delegated authority from Cabinet and Assistant Director Strategic Development	Date:  22/3/19

## Ipswich Strategic Planning Area

### Statement of Common Ground

#### Section I Annex – Cross Boundary Infrastructure Requirements

The information set out in this table, relates to Section I of the Ipswich Strategic Planning Area Statement of Common Ground. It sets out the cross boundary infrastructure requirements identified to support the delivery of Local Plans being prepared for each of the local planning authorities (Ipswich, Babergh, Mid Suffolk and Suffolk Coastal).

The table will be updated as Local Plans are prepared.

This version accompanies the Statement of Common Ground Version 4 – March 2019 and relates to cross boundary infrastructure requirements identified in relation to:

- Suffolk Coastal Final Draft Local Plan (January 2019)
- Ipswich Core Strategy Review Preferred Options and Ipswich Site Allocations and Policies Review Preferred Options (November 2018)
- Emerging Babergh and Mid Suffolk Joint Local Plan

Infrastructure requirement / issue	Relevant authorities	Evidence	Relevant policies in plans	Outcomes
<b>Transport</b>				
Improvements at A14 junctions 53 – 58 to address capacity issues.	Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council, Suffolk County Council, Highways England	Transport Modelling for Babergh, Ipswich, Mid Suffolk and Suffolk Coastal Local Plans: Forecasting Report; Volume 1; Suffolk Coastal and Ipswich (August 2018)  Forecasting Report Volume 2: Suffolk Coastal and	Suffolk Coastal Final Draft Local Plan Policies SCLP2.2 Strategic Infrastructure Priorities, SCLP3.5 Infrastructure Provision, SCLP7.1 Sustainable Transport and SCLP12.20 Land at Felixstowe Road.	Specific contributions will be sought from individual developments which would have a significant impact on the junctions.  Suffolk Coastal Final Draft Local Plan Policy SCLP12.20 Land at Felixstowe Road requires opportunities to enhance the



Infrastructure requirement / issue	Relevant authorities	Evidence	Relevant policies in plans	Outcomes
		Ipswich and an updated Methodology Report were published in January 2019.	Ipswich Borough Council Local Plan Review Preferred Options November 2018 policy ISPA2 Strategic Infrastructure Priorities and CS20 Key Transport Proposals.	Seven Hills junction (J58) to be explored.
Improvements to sustainable transport	Babergh District Council, Ipswich Borough Council, Mid Suffolk District Council, Suffolk Coastal District Council, Suffolk County Council	<p>Transport Modelling for Babergh, Ipswich, Mid Suffolk and Suffolk Coastal Local Plans: Forecasting Report; Volume 1; Suffolk Coastal and Ipswich (August 2018)</p> <p>Suffolk Coastal Final Draft Local Plan Sustainability Appraisal</p> <p>Forecasting Report Volume 2: Suffolk Coastal and Ipswich and an updated Methodology Report were published in January 2019.</p>	<p>Suffolk Coastal Final Draft Local Plan Policies SCLP2.2 Strategic Infrastructure Priorities, SCLP3.5 Infrastructure Provision and SCLP7.1 Sustainable Transport.</p> <p>Ipswich Borough Council Local Plan Review Preferred Options November 2018 policy ISPA2 Strategic Infrastructure Priorities and CS20 Key Transport Proposals.</p>	<p>Suffolk Coastal Final Draft Local Plan Policy SCLP12.24 Land at Humber Doucy Lane, as part of a cross-boundary location for development with Ipswich Borough (policy ISPA4 in Ipswich Local Plan Review Preferred Options), includes a requirement for a robust package of measures to promote sustainable transport.</p> <p>Policies SCLP12.24 and ISPA4 require development of the land to contribute towards the establishment of the Ipswich 'green rim'.</p>
<b>Utilities</b>				
Extension of 132kV line to Felixstowe and establishment of a new 132/33kV substation with	UK Power Networks / OFGEM	Information from UK Power Network	Suffolk Coastal Final Draft Local Plan Policy SCLP2.2 Strategic Infrastructure Priorities	Suffolk Coastal Final Draft Local Plan Policy SCLP2.2 Strategic Infrastructure Priorities states that Suffolk Coastal District

<b>Infrastructure requirement / issue</b>	<b>Relevant authorities</b>	<b>Evidence</b>	<b>Relevant policies in plans</b>	<b>Outcomes</b>
<p>links to the 33kV network on the Shotley and Harwich peninsulas.</p> <p>Involves reinforcement and asset replacement of old equipment with higher capacity new equipment.</p>			SCLP3.5 Infrastructure Provision	<p>Council will work with partners such as UK Power networks to enable the timely delivery of projects such as this.</p> <p>.</p> <p>Suffolk Coastal Final Draft Local Plan Policy SCLP3.5 states that Suffolk Coastal District Council will work with UK Power Networks to ensure proposed growth does not conflict with the electricity supply network.</p>
Improvements to waste management facilities at Foxhall	Suffolk Coastal District Council, Ipswich Borough Council, Suffolk County Council	Suffolk County Council forecasts	<p>Suffolk Coastal Final Draft Local Plan Policies</p> <p>SCLP12.25, SCLP12.32, SCLP12.33, SCLP12.45, SCLP12.46, SCLP12.47, SCLP12.51, SCLP12.52, SCLP12.58, SCLP12.61, SCLP12.62, SCLP12.63, SCLP12.64, SCLP12.67, SCLP12.68, SCLP12.71, SCLP12.72. (Refer to Final Draft Local Plan for details of the above site allocations)</p>	Contributions through the Community Infrastructure Levy identified in Infrastructure Delivery Framework in Suffolk Coastal Final Draft Local Plan towards improvements at Foxhall Household Waste Recycling Centre.

<b>Infrastructure requirement / issue</b>	<b>Relevant authorities</b>	<b>Evidence</b>	<b>Relevant policies in plans</b>	<b>Outcomes</b>
Improvements to waste management facilities in Ipswich	Ipswich Borough Council and Babergh and Mid Suffolk District Councils	Suffolk County Council forecasts	Policy SP2 in Ipswich Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review – Preferred Options (November 2018)	In relation to site IP003 'Waste tip and employment area north of Sir Alf Ramsey Way', the Ipswich Preferred Options plan November 2018 states 'Alternative sites will need to be agreed with the County Council and the site operators for the relocation of the Concrete Batching Plant and Household Waste Recycling Centre before the sites can be made available'.
Improvements to waste management facilities in Stowmarket (Mid Suffolk District)	Suffolk Coastal District Council, Mid Suffolk District Council and Suffolk County Council	Suffolk County Council forecasts	Suffolk Coastal Final Draft Local Plan Policy SCLP12.59 Land adjacent to Swiss Farm, Otley	Contributions through the Community Infrastructure Levy identified in Infrastructure Delivery Framework in Suffolk Coastal Final Draft Local Plan towards improvements to waste management facilities in Stowmarket.
<b>Green Infrastructure</b>				
Creation of 'green rim' around Ipswich	Ipswich Borough Council, Babergh District Council, Mid Suffolk District Council and Suffolk Coastal District Council.	Update to the Haven Gateway Green Infrastructure Strategy for the Ipswich Policy Area (August 2015)	Ipswich Borough Council Local Plan Review Preferred Options (November 2018) policy ISPA4 Cross Boundary Working to Deliver Sites and CS16 green	Policies ISPA4 and SCLP12.24 require development to contribute to the creation of the 'green rim'.

Infrastructure requirement / issue	Relevant authorities	Evidence	Relevant policies in plans	Outcomes
			Infrastructure, Sport and Recreation. Suffolk Coastal Final Draft Local Plan policy SCLP12.24 Land at Humber Doucy Lane.	
<b>Education</b>				
Education capacity in north east Ipswich area.	Suffolk Coastal District Council, Ipswich Borough Council and Suffolk County Council	Suffolk County Council education forecasts	<p>Suffolk Coastal Final Draft Local Plan Policies SCLP12.24 Land at Humber Doucy Lane and SCLP12.67 Land at Keightley Way, Tuddenham SCLP12.68 Land south of Lower Road, Westerfield</p> <p>Ipswich Core Strategy and Policies Review Preferred Options Policy ISPA4 Cross Boundary Working to Deliver Sites</p>	<p>Contributions through the Community Infrastructure Levy identified in Infrastructure Delivery Framework in Suffolk Coastal Final Draft Local Plan towards the provision of additional primary and secondary spaces at the Ipswich Garden Suburb.</p> <p>Policy ISPA4 requires primary school places to meet the needs of the development.</p> <p>Under SCLP12.24 and ISPA4, development to the north of Humber Doucy Lane is proposed for after 2031, reflecting likely delivery rates of education infrastructure at Ipswich Garden Suburb.</p>
Claydon High School (Mid Suffolk District) forecast to exceed capacity	Suffolk Coastal District Council, Mid Suffolk District Council and	Suffolk County Council education forecasts	Suffolk Coastal Final Draft Local Plan Policies SCLP12.71 Land at Mow	Contributions through the Community Infrastructure Levy identified in Infrastructure

<b>Infrastructure requirement / issue</b>	<b>Relevant authorities</b>	<b>Evidence</b>	<b>Relevant policies in plans</b>	<b>Outcomes</b>
	Suffolk County Council		Hill Witnesham and SCLP12.72 Land at Street Farm, Witnesham	Delivery Framework in Suffolk Coastal Final Draft Local Plan towards additional spaces related to development in Suffolk Coastal District.
<b>Early years provision</b>				
Early years capacity in north east Ipswich	Suffolk Coastal District Council, Ipswich Borough Council and Suffolk County Council	Suffolk County Council forecasts	Suffolk Coastal Final Draft Local Plan Policies SCLP12.24 Land at Humber Doucy Lane	<p>Policy SCLP12.24 requires 0.1ha of land for an early years setting if needed in the Suffolk Coastal part of the site.</p> <p>Ipswich Borough Council Local Plan Review Preferred Options (November 2018) Policy CS17 identifies that development will need to meet the on- and off-site infrastructure needed to support the development and ISPA4 addresses cross boundary working on sites.</p>
<b>Health</b>				
Additional floorspace at practices within Ipswich Borough.	Suffolk Coastal District Council, Ipswich Borough Council, NHS, Ipswich & East Suffolk Clinical Commissioning Group	Ipswich & East Suffolk Clinical Commissioning Group forecasts	<p>Suffolk Coastal Final Draft Local Plan Policies</p> <p>SCLP12.57 Land at Bridge Road, Levington, SCLP12.68 Land south of</p>	Contributions towards enhancements are identified alongside policies SCLP12.24, SCLP12.57, SCLP12.67 and SCLP12.68 in the Suffolk Coastal Final Draft Local Plan.

Infrastructure requirement / issue	Relevant authorities	Evidence	Relevant policies in plans	Outcomes
			Lower Road, Westerfield, SCLP12.24 Land at Humber Doucy Lane SCLP12.67 Land off Keightley Way, Tuddenham	
<b>Libraries</b>				
Improvements to library provision within Ipswich Borough	Suffolk Coastal District Council, Ipswich Borough Council and Suffolk County Council	Suffolk County Council	Suffolk Coastal Final Draft Local Plan Policies SCLP12.24 Land at Humber Lane, SCLP12.25 Suffolk Police Headquarters, Martlesham, SCLP12.45 Land to the South East of Levington Lane, Bucklesham, SCLP12.67 Land off Keightley Way, Tuddenham, SCLP12.68 Land off Lower Road, Westerfield, SCLP12.71 Mow Hill, Witnesham and SCLP12.72 Land at Street Farm, Witnesham.	The Suffolk Coastal Final Draft Local Plan identifies a contribution towards improvements at Ipswich library through the Community Infrastructure Levy, in relation to these policies.